

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
vs.)
SHANE HANS,)
Defendant.)
CRIMINAL NO. 21-mj-7159-MAB
Title 21
United States Code,
Section 841(a)(1) and (b)(1)(C)
FILED UNDER SEAL

CRIMINAL COMPLAINT

I, Derek Parker, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

(Possession with Intent to Distribute a Controlled Substance: Methamphetamine)

On or about May 14, 2021, in Fayette County, within the Southern District of Illinois,

SHANE HANS,

Defendant herein, knowingly and intentionally possess with the intent to distribute or dispense a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 2

(Distribution of a Controlled Substance: Methamphetamine)

On or about July 24, 2021, in Fayette County, within the Southern District of Illinois,

SHANE HANS,

Defendant herein, knowingly and intentionally distributed a mixture and substance containing a

detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 3

(Felon in Possession of a Firearm)

On or about May 14, 2021, in Fayette County, within the Southern District of Illinois,

SHANE HANS,

Defendant herein, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, Felon in Possession of a Firearm, in Fayette County Circuit Court in case number 16CF157, did knowingly possess a firearm, that is; a .22LR caliber Ruger pistol and ammunition, with an unknown serial number, and the firearm was in and affecting commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

AFFIDAVIT

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since July 2017, and as such, I am vested with the authority to investigate violations of Federal laws, including Titles 18 and 21 of the United States Code. Your affiant also has fifteen (15) years of prior law enforcement experience as a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA) and as a municipal Police Officer for the Village of Fairmont City, Illinois. Your affiant is currently assigned to the Springfield Division of the FBI, Fairview Heights, Illinois Resident Agency and has primary investigative responsibilities for

violent and drug crimes occurring in the United States of America, particularly in the Southern District of Illinois.

2. During my career as a law enforcement officer, I have participated in numerous narcotics investigations involving the manufacture, transportation, and distribution of controlled substances. These investigations have resulted in the seizure of controlled substances and proceeds from the sale of controlled substances, as well as the arrests and convictions of drug traffickers. I work in collaboration with a group of FBI SAs and other law enforcement officers. These SAs and officers have participated in numerous drug investigations, which have resulted in the seizure of methamphetamine, crystal methamphetamine, cocaine, marijuana, and other controlled substances. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

PROBABLE CAUSE

1. **Shane HANS:** As set forth in more detail below, **Shane HANS** (hereinafter “HANS”) is a prohibited person as defined by Title 18 U.S.C. 922(g). HANS’ criminal history includes felony convictions for a 2016 Fayette County, Illinois, case for Unlawful Possession of Weapon by convicted Felon, Possession of Methamphetamine and Felony traffic in which he received three (3) year sentence in the Illinois Department of Corrections. In a 2004 Fayette County, Illinois case for Mfg/Del 100-400 gr of Methamphetamine he received three (3) year nine (9) months sentence in the Illinois Department of Corrections, three (3) years sentence Unlawful Possession of Weapon by a convicted Felon and one (1) year sentence for Felony traffic. In a 2003 Montgomery County, Illinois, case for Unlawful Possession of Weapon by a convicted Felon and

received three (3) years in the Illinois Department of Corrections. In a 2002, Madison County, Illinois, case for Manf/Del Cannabis he received a two (2) year sentence in the Illinois Department of Corrections. In a 1999 Bond County, Illinois Residential Burglary case, he received five (5) years in the Illinois Department of Corrections. **HANS** has additional arrests and convictions that are not listed in this affidavit.

2. On May 14, 2021, Fayette County Sheriff's Deputy Robert Fritchler applied for a search warrant for HANS' residence and Fayette County Judge Shafer issued the warrant on May 14, 2021. During the search the following items were seized: Approximately 15 grams of methamphetamine (later analyzed by ISP Crime Lab results positive), .22LR caliber Ruger pistol (loaded) under HANS mattress, ammunition, digital scales, digital camera system, police radio scanner, \$210 USC, over 100 grams of liquid containing meth, drug paraphernalia, twenty (20) pills of pseudoephedrine (commonly used to manufacture methamphetamine). The .22LR caliber Ruger pistol traveled in interstate commerce prior to HANS' possession on May 14, 2021. Based upon Affiant's experience and training, the presence of digital scales, and HANS' statement that police failed to locate additional methamphetamine hidden in a chair, the fifteen (15) grams of methamphetamine was for resale and not personal use.

3. On July 24, 2021, agents coordinated a controlled purchases of crystal methamphetamine from HANS utilizing the CS. Agents used standard operating procedures for the CS to conduct the controlled purchase of narcotics. For example, law enforcement searched the CS and prior to and after the transaction to make certain CS carried nothing into or from the transaction than what law enforcement provided and what HANS sold to the CS. Prior to the

transactions, law enforcement outfitted the CS with recording equipment and provided the CS with \$500 of pre-recorded FBI funds to make the purchase. Before, during, and after the transaction, law enforcement-maintained surveillance on the CS. Following the transaction, law enforcement met the CS at a prearranged meeting location and retrieved the suspected methamphetamine, the recording equipment and debriefed the CS regarding the transaction.

4. On July 24, 2021, at the direction and supervision of agents, CS purchased approximately fourteen (14) grams of methamphetamine from HANS inside the Hans' residence. While at the Hans' residence, CS knocked on the front door and HANS directed the CS to his garage/shed on the front of the Hans' residence. Once inside, HANS sold the methamphetamine to the CS for \$500. CS and HANS also discussed HANS possessing a firearm on the Hans' residence. HANS told the CS he didn't want to get rid of his gun. Once the transaction was complete the CS departed the residence followed by surveillance. HANS exited the garage and entered the front door of the Hans' residence.

5. The suspected methamphetamine from the transaction field-tested positive for the presence of methamphetamine. DEA laboratory analysis of the suspected methamphetamine purchased during the transaction is pending. Your affiant's review of the recording from the transaction is consistent with CS's account of the transaction.

Respectfully submitted,



DEREK S. PARKER
Special Agent
Federal Bureau of Investigation

State of Illinois)
) SS.
County of St. Clair)

Sworn to and subscribed on the 27th day of July 2021.



Mark A. Beatty
United States Magistrate Judge

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